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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case: 2:07-cr-20257
Assigned To: Cox, Sean F
Referral Judge: Morgan, Virginia M
Filed: 05-11-2007 At 04:01 PM
INFO USA V RAINES (LH)

D-1 ALAN RAINES,

Defendant.

VIOLATIONS: 29 U.S.C. §501(c)
18 U.S.C. §1344

INFORMATION

THE U.S. ATTORNEY CHARGES THAT:

COUNT ONE

(29 U.S.C. §501(c) - *Embezzlement of Labor Union Assets*)

On or about November, 1999 through July, 2006, in the Eastern District of Michigan, Southern Division, Defendant ALAN RAINES, while an officer, that is, financial secretary of Steelworkers Local 1358, a labor organization engaged in an industry affecting commerce, did embezzle, steal and unlawfully and willfully abstract and convert to his own use the moneys, funds, securities, property, and other assets of said labor organization in the approximate amount of \$274,262.39, in violation of Title 29, United States Code, Section 501(c).

COUNT TWO

(18 U.S.C. §§ 1344 - Bank Fraud)

D-1 ALAN RAINES

On or about July 11, 2004 through July 26, 2006, in the Eastern District of Michigan, Southern Division, defendant ALAN RAINES did knowingly and intentionally devise and execute a scheme to obtain moneys owned by or under the custody and control of Comerica Bank, a federally insured financial institution, by means of false and fraudulent pretenses. In executing this scheme, defendant ALAN RAINES: 1) by virtue of his position as financial secretary, obtained checks connected to an account for Steelworkers Local 1358; 2) forged the signature of a third party on each check; and 3) wrote checks to himself for his personal use, all in violation of Title 18, United States Code, Section 1344.

STEPHEN J. MURPHY
UNITED STATES ATTORNEY

s/Jennifer Gorland
Chief, General Crimes Unit

s/Jeanine Jones
Assistant United States Attorney

United States District Court
Eastern District of Michigan

Criminal Case Co

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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

| | |
|--|-------------------------------|
| Companion Case Information | Companion Case Number: |
| This may be a companion case based upon LCrR 57.10 (b)(4) ¹ : | Judge Assigned: |
| <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No | AUSA's Initials: JMJ |

Case Title: USA v. ALAN RAINES

County where offense occurred : Oakland County

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☐ Indictment/ **XX** Information --- no prior complaint.
☐ Indictment/ ☐ Information --- based upon prior complaint [Case number:]
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information:

Superseding to Case No: **Judge:**

- ☐ Original case was terminated; no additional charges or defendants.
☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:


Defendant name

Charges

Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

May 11, 2007

Date


 Jeanine M. Jones
 Assistant United States Attorney
 211 W. Fort Street, Suite 2001
 Detroit, MI 48226-3277
 Phone: (313) 226-9597
 Fax: (313) 226-2372
 E-Mail address: jeanine.m.jones@usdoj.gov
 Attorney Bar #: P 55429

¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.